

Thomas F. Newkirk
1316 Royal Ave., NE
Canton, OH 44705
November 9, 1997

The United States
Environmental Protection Agency
Region 5
77 W. Jackson Blvd
Chicago, IL 60604

RECEIVED

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AIR ENFORCEMENT BRANCH
U.S. EPA, REG. 5

Dear Sir or Madam:

I am writing in reference to a problem my neighborhood is having with a company located at the end of our street called Ohio Cast Products. This problem started in 1993. The EPA in Dayton, OH and the District EPA in Twinsburg, OH was contacted in 1994 in which they referred me back to the EPA office in Canton.

Last year about twenty five people in this neighborhood went through a civil suit against this company and we settled for the damages that was done to our properties. Approximately around the month of October this year, this same company started discharging emissions again. This particular discharge is something other than what was being discharged a year ago.

Enclosed is a copy of EPA's report. Nov. 2 of this year I noticed that there was another discharge overnight. EPA was called Nov. 3. An inspector from EPA came and took pictures of the porch steps of my home. My question was why did this incident happen again if EPA is doing their job? And are they doing all that they are suppose to do in seeing that this incident doesn't happen again? This black substance is being discharged all over the neighborhood, not to mention us inhaling it.

Various newspapers have been called by me to get this problem in the news. My daughter has gotten the NAACP involved as she feels that this is showing lack of concern for this predominantly black neighborhood by this plant, and also by EPA located here.

I would like your involvement in this matter to settle this problem with Ohio Cast Products. Any help that you can give to our neighborhood

would be greatly appreciated.

We are now awaiting EPA's report about the discharge from Nov. 2, 1997.

Respectfully,

A handwritten signature in cursive script that reads "Thomas F. Newkirk". The signature is written in dark ink and is positioned above the printed name.

Thomas F. Newkirk

OHIO CAST PRODUCTS ("OCP")
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OCTOBER 3, 1997

COPY

On the above date, members of the Canton LAA went to OCP to conduct an inspection of part of the operation at OCP which is contributing to nuisance complaints involving citizens on the North side of OCP. In fact, complaints have been received from both residents in the adjacent neighborhood as well as employees of the United Foundries operation located just NE of OCP. All recent complaints regarded black, gritty, relatively large particulate matter being deposited on vehicles, homes, and other personal property. The black, gritty material was observed and collected by members of this Agency and the materials appear to be mold sand from the OCP operation. The question that needed to be answered was: which process at OCP causes this emission and why? The two suspect areas at OCP are: 1) the new baghouse used to control mold sand from the sand shakeout process (P901) and 2) the wet scrubber used to control emissions from the sand handling process (F003). The representatives from the Canton LAA that conducted the inspection were Rick L. Miller, Mark Adams and Bob Zahirsky.

Upon arrival at OCP, we met with Bill Gaynor, the Dir. of Human Resources. Dave Simon (OCP Environmental personnel) was at the OCP sister plant (Technocast) in Orrville, OH. We introduced ourselves to Mr. Gaynor and explained that the Canton Agency had received numerous and continuous complaints regarding black, mold sand type of materials being deposited on neighboring properties North of OCP. It was also explained that wind direction indicated that OCP was a strong suspect as to the source of the depositions. Two (2) sources of possible emissions of such materials would be OCP's new baghouse for P901 and the wet scrubber for F003. The Canton LAA was at OCP to look at those processes as well as the records which were to be kept concerning them. Mr. Gaynor was already familiar with the neighborhood complaints and some of the actions OCP had taken in it's attempt to find the problem. Mr. Gaynor called for Larry Hansen (OCP Maintenance Coordinator) and Dave Alkire (OCP Maintenance Dir.) to escort us to the specific areas and to answer any specific questions the Agency might have. Also, Dave Simon was called to return from Orrville so that the OCP records could be inspected.

The first area we looked at was the sand shakeout area in order to confirm that it was operating. The unit was in operation and all in-house, emission pickup locations appeared to have sufficient draft to minimize dust. In looking at the baghouse for P901, it was seen that the area surrounding it was not being maintained in accordance with good housekeeping practices (i.e. areas underneath the BH were covered with the black, gritty dust - some loose piles [new?] and some compacted piles [old?]). The BH is divide into two compartments, a North side (#2) and a South side (#1) and each side has a magnahelic gauge installed. At 10:54 am, the S (#1) ΔP reading was 3.4" H_2O and the N (#2) ΔP reading was 2.7" H_2O . As we went NE of the BH stack, we could feel particulate matter hitting us. An accumulation of mold sand was covering the cement pad on which the BH fan and motor was mounted. On a flange around the fan housing, an accumulation of mold sand was seen and photographed. Since we could feel emission but not see any from the stack, it was assumed that the particles were large. Airborne particles were also collecting (falling out) on our notes as we recorded our observations. Therefore, a letter on white paper was placed about 30 feet NE of the BH stack and photographed as is. Eight minutes later, the letter was again observed and photographed in order to show the amount of particulate matter which accumulated from fall out over that time period. The area underneath the BH was also photographed in order to show the housekeeping practices utilized by OCP. Information the Canton LAA had previously received from OCP concerning this BH was confirmed. That info was that on 9/18/97, OCP checked the BH system for leaks (visually) but found

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none. That lead to a more thorough inspection. On 9/22/97 during the third shift, representatives from the Mike Volk Co. of Mansfield, OH conducted a black light test on the fabric filters and found about fifty (50) bad bags. OCP only had two (2) bags on hand for replacement and therefore, no bags had been changed at the time of this inspection. OCP had to order replacement bags. The new bags were to be received on 10/4/97 and were to be installed during the third shift on that date. OCP planned to have the Mike Volk Co. recheck the bags after installation to see if additional bags need replaced and to ensure proper fit up. No formal report from the Mike Volk Co. had been received by OCP at the time of the inspection. However, they did receive a preliminary report, of which a copy was asked for and received by this Agency (dropped off at the Agency office later that same day). Before leaving the BH, Dave Alkire of OCP stated that OCP was planning on installing broken bag detectors on this particular bag filter house

[The BH for the sand shakeout unit (P901) was installed under PTI 15-1259 and the installation was completed November 22, 1996. A stack test on this BH was conducted July 30, 1997. No VE's were visible from the BH at the time of the test. The ΔP reading on the N and S compartments of the BH were between 3" & 3.3" H_2O at the time of testing. The PTI allowable for PM is 0.31 lb/hr. The stack test results indicate that the actual emissions from the BH during the testing was between 8.45 and 15.51 lb/hr.]

We then moved on to the wet scrubber. This unit was also in operation and it's operating parameters were checked to see if they were in accord with PTO T&C's. This control device is to control emissions from the sand handling system (F003). The wet scrubber also was used (at one time) to control emissions from an EIF ("electric induction furnace") (P011) and because of this, operating parameters for the wet scrubber were listed under the P011 PTO T&C's with reference to the P011 source in the F003 PTO T&C's. The operating parameters require the wet scrubber to be operated at: 1) not less than 5.5" H_2O pressure drop flange to flange, and not more than 7.0" H_2O pressure drop flange to flange; 2) not less than 350 gallons per minute water volume (flow rate); and 3) not less than 30 psig water pressure. The actual scrubber operating parameters are to be recorded at a frequency of one time per every four (4) hours of operation of the scrubber, and at a minimum, every time the scrubber is operated. At 11:18 am on 10/3/97, the operating parameters on the wet scrubber were observed and recorded by Rick L. Miller to be 6.3" H_2O as the ΔP , water flow was 320 gpm at a water pressure of 45 psig. About ten (10) minutes later, those readings were confirmed by Bob Zahirsky's observations. No VE's were observed coming from the wet scrubber stack during this inspection. A "white paper test" was conducted about 15 feet downwind of the stack. After about 5 minutes, no particulate matter accumulations were observed. A collection of particulate matter was observed on the stack flange. This material was photographed and inspected in more detail. It was determined that the material was crusted and not a recent deposit. A photograph was taken of the BH and wet scrubber to show the positional relationship of one to the other. By this time, Dave Simon had arrived at OCP and Tom Hofstetter (OCP Plant Engineer) was also present.

At this point in the inspection, we proceeded to an office area where we could review maintenance logs and records for the P901 BH and the wet scrubber. According to OCP's PTI #15-1259 T&C's, OCP is to maintain monthly records of the following info: 1) the operating hours for each month, 2) after the first 12 months of operation, the operating hours as a rolling 12 month summation, 3) daily

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records of the daily average hourly metal shakeout rate, and 4) the BH ΔP on a weekly basis. Rick L. Miller looked at BH records for the 1st shift from 6/2/97 to 10/2/97. The OCP records indicated that the S (#1) ΔP reading ranged from 1.7" to 3.7" H_2O and the N (#2) ΔP reading ranged from 2.4" to 3.8" H_2O . Mark Adams noticed on the records he was reviewing that certain "recorders" seemed to record the same info regardless of the date. In looking at the 1st shift records for the P901 BH from 6/2/97 to 10/2/97, it could be seen that B. Carn (OCP maintenance personnel) almost always recorded 2.3" and 3.2" H_2O for the system. In looking at the records for the wet scrubber system for the same shift and time period, it could be seen that B. Carn almost always recorded ΔP at 6.5" H_2O , P_{H_2O} at 34 psig and H_2O flow at 320 or 340 gpm. In general, the wet scrubber parameters as recorded for the 1st shift from 6/2/97 to 10/2/97 indicated a ΔP range of 6.3 to 6.5" H_2O , P_{H_2O} range of 30 to 39 psig and H_2O flow range of 160 to 350 gpm. Data recorded by Frank Kolleth (OCP maintenance personnel) varied, as would be expected. Data recorded by Bill Milburn (OCP maintenance personnel) varied for the BH, but were consistently almost always the same for the wet scrubber: ΔP at 6.0 or 6.5" H_2O , P_{H_2O} at 40 psig and H_2O flow at 3x100 gpm. In fact, the form utilized by OCP personnel for the parameter records indicates the operating limits for the wet scrubber to be: ΔP at between 6" & 8" H_2O , P_{H_2O} at between 30 & 40 psig and H_2O flow at 300 gpm (minimum). The operating parameters were checked and recorded by OCP personnel once per shift for both the BH and the wet scrubber.

The last records viewed were those concerning the sand shakeout operation: 1) the metal shakeout rate and 2) the total hours of operation. These records were computerized at Dave Simon's office, along with a hard copy printout. Those records were quickly viewed and Rick L. Miller requested and received a printout of those records so that they could be looked at more closely at the Agency office. We exited OCP stating that we would be in touch concerning the outcome of the inspection.

[In reviewing the previously noted operation record copies at a later time, it was noted that days of no production were recorded by a zero (0) and those zero's were included in averaging calculations, which resulted in incorrect information. It was also noted that some data conversions (i.e. pounds to tons) were incomplete and this mistake also resulted in incorrect data summation and averaging. These errors were brought to Dave Simon's attention several days later at a time in which additional questions were asked by this Agency concerning clarification of the recorded data. As a result, Dave Simon submitted updated records to this Agency, dated October 9, 1997. However, some of the same noted mistakes were also noted in the updated records.]

In the afternoon of October 3, 1997, Rick L. Miller returned to the OCP area to observe the operation from off-site of OCP property. The area visited is owned by United Foundries ("UF"). A "white paper test" was setup and conducted about 300 feet and downwind of the P901 BH stack at OCP. Particulate matter could be felt hitting Rick L. Miller's face and hands. The "white paper" did not reveal as much material as was expected. This is because the wind in the open area was blowing the particulate from the paper almost as fast as it was accumulating. Photographs were taken quite some time later to show that some fallout was taking place off-site of the OCP property. A white tarp was seen on the UF property about 250 feet downwind of the P901 BH stack at OCP. That tarp had collected the black, gritty deposits that were now thought to be coming from the OCP BH. Photographs were taken and a sample was collected from the tarp. When asked, a UF security

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guard indicated that the tarp had been at that location for several weeks. Additional photographs were taken of UF employee vehicles, some of which were reported to Rick L. Miller, as having been washed the day previous. The black, gritty deposits were very evident. One UF employee told Rick L. Miller that the marks in the paint on the employee's truck cannot be buffed out (scratches and silvery flecks were evident in the black paint).

Summary

- 1) A black light test conducted by the Mike Volk Co. on September 22, 1997 showed about 50 deteriorated bags in the OCP P901 BH.
- 2) The OCP BH continued to be operated in an unacceptable manner without this Agency being notified of the malfunction orally or in writing.
- 3) Only two (2) replacement bags were on hand for the OCP P901 BH.
- 4) Not having replacement bags on hand does not correspond to the PM Plan established and designed by OCP for other OCP BH systems.
- 5) Replacement bags were ordered and scheduled to be installed on October 4, 1997.
- 6) A follow-up black light test is planned for the OCP P901 BH.
- 7) The wet scrubber H₂O flow is below 350 gpm (except for one day as observed on records from 6/2/97 to 10/2/97).
- 8) Even though emissions from the EIF are now directed to a BH, the operating parameters for the wet scrubber have never been changed - the P011 PTO T&C for a 350 gpm H₂O flow is not being met.
- 9) Wet scrubber parameters are being recorded by OCP personnel once per shift (8 hours).
- 10) P011 PTO T&C's require the wet scrubber parameters to be recorded once every four (4) hours of operation and as a minimum, once every time of operation - this requirement is not being met.
- 11) Some parameter and maintenance records look as if the readings were never properly done or properly recorded - i.e. same reader/same shift/same readings/day after day (?).
- 12) Fudged (fraudulent ?) records!
- 13) Deficient operation records result in incorrect summation and averaging data.

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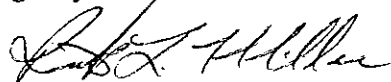
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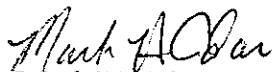
14) Particulate matter is being deposited on property off-site of OCP property and some of those deposits appear to be causing property damage.

On 10/10/97, Bill Gaynor called this office and talked to Mark Adams. Mark claimed that Mr. Gaynor had told him that OCP had in fact, replaced 50 bags (assumed to be on 10/4/97). Mr. Gaynor also noted that OCP was pretty sure that the bags were being "sandblasted" by the sand entering the baghouse at an unforeseen increased flow rate through the entire collection system. Mr. Gaynor said that OCP planned on installing dampers within the duct work before sand could enter the baghouse to decrease the velocity of the sand before it could reach the bags. (Some of the terminology may not be correct because Mr. Gaynor is the Dir. of Human Resources and not an engineer.) Mr. Gaynor ended the conversation by ensuring that this information would be written up and sent to this Agency's office. As of 10/21/97, no letter or report had been received by this Agency.



Rick L. Miller

APCD Staff Field Inspector



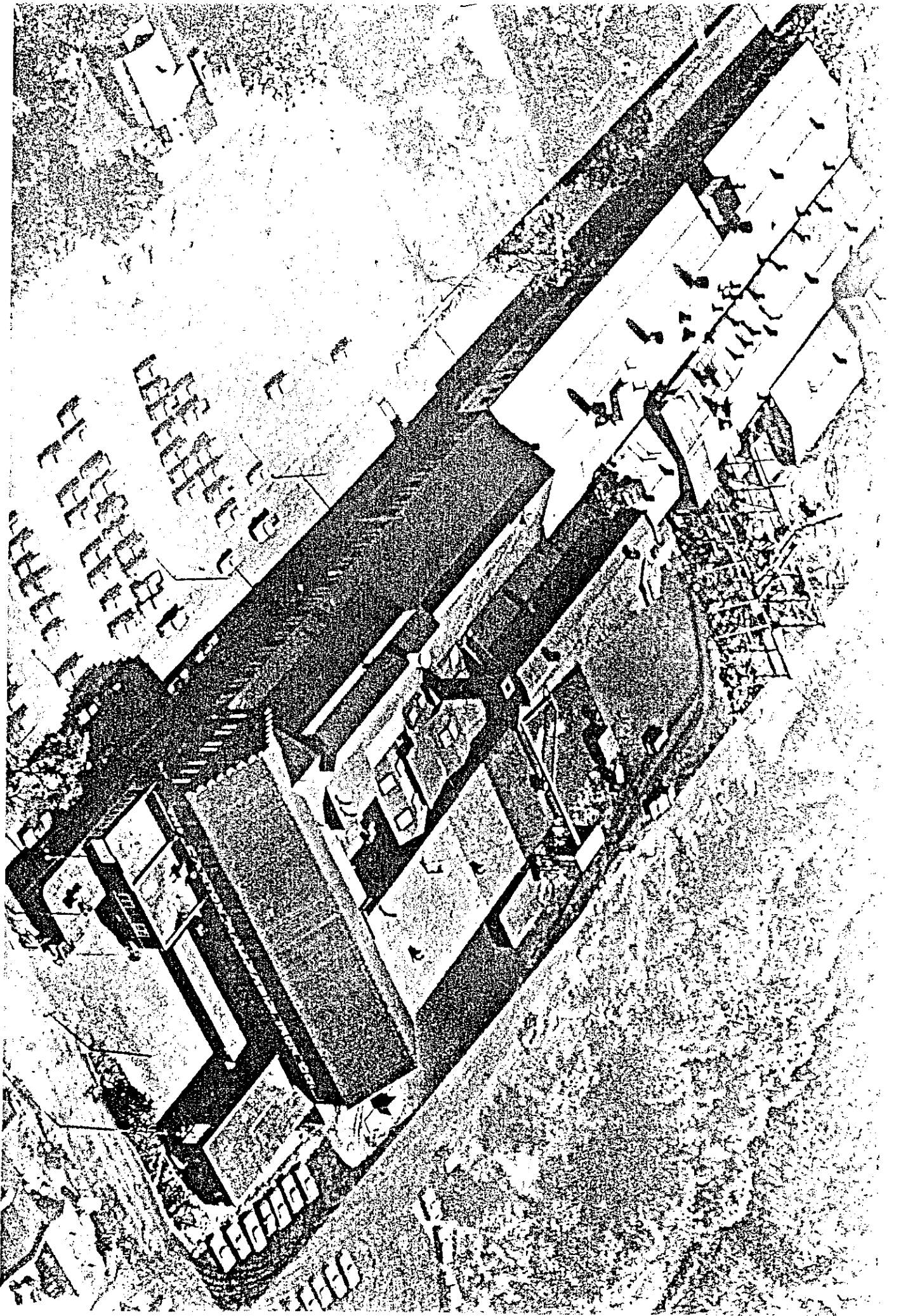
Mark H. Adams

APCD Staff Field Inspector



Bob Zahirsky

APCD Engineer



Canton Malleable Iron Company's
126,000 sq. ft. plant in Canton, Ohio.

BLACK, McCUSKEY, SOUERS & ARBAUGH

A LEGAL PROFESSIONAL ASSOCIATION

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March 6, 1996

Mr. and Mrs. Thomas Newkirk
1316 Royal Avenue, N.E.
Canton, OH 44705

RE: Ohio Cast Products

Dear Mr. and Mrs. Newkirk:

Please be advised that we have met with all of the neighbors whom we represent, and all have agreed to reach a settlement with Ohio Cast Products ("Ohio Cast"). As you are aware, you have previously agreed to a specified settlement amount. A copy of your settlement form is enclosed. Ohio Cast has indicated that it needs 90 days to pay all of the neighbors' settlement amounts. You should be aware that in the event this matter would proceed to litigation, we would anticipate it going to trial sometime in March or April of 1997. Therefore, although you have waited a period of time to settle your claims, we believe the additional 90 days to be acceptable given the time it would take to file suit and proceed to trial.

In return for payment of your settlement sum, Ohio Cast will require you to execute a Release releasing it of all liability for any property damage you have incurred as of the date of the execution of the Release. It is important to note that you will not release Ohio Cast of any liability for any personal injury claim that has not been discovered to have been caused by the air emissions to date, nor for any property damage that may occur in the future.

PURSUANT TO THE TERMS OF THE SETTLEMENT, YOU MUST AGREE NOT TO DISCLOSE, OR PERMIT TO BE DISCLOSED TO ANY PERSON OR ENTITY (INCLUDING THE NEWS MEDIA), ANY OF THE TERMS OF THE SETTLEMENT, INCLUDING, WITHOUT LIMITATION, THE AMOUNT OF ANY MONIES PAID TO YOU IN SETTLEMENT. ANY DISCLOSURE OF TERMS OF THE SETTLEMENT WILL

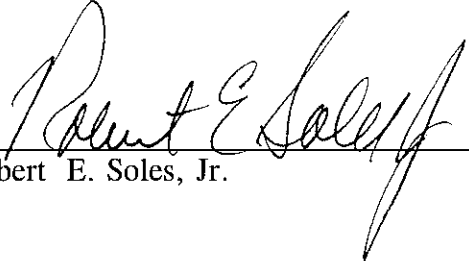
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**JEOPARDIZE ANY SETTLEMENT WE HAVE REACHED. THEREFORE, PLEASE TAKE
APPROPRIATE STEPS TO KEEP ALL SETTLEMENT TERMS CONFIDENTIAL.**

Once again, if you have any questions, please do not hesitate to call Terry Seeberger or me. Otherwise, we anticipate having a settlement check to you within 90 days of the execution of the aforementioned release.

Sincerely,

BLACK, McCUSKEY, SOUERS & ARBAUGH



Robert E. Soles, Jr.

RES:lj

Enclosure

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